

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ANDRE ROYAL,	)	
	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:19-cv-5164-AJN
	)	
NATIONAL FOOTBALL LEAGUE	)	
MANAGEMENT COUNCIL, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF ROBERT C. HILLIARD IN SUPPORT OF PLAINTIFF'S  
RESPONSE TO THE BOARD DEFENDANTS' MOTION TO DISMISS  
PLAINTIFFS' AMENDED COMPLAINT**

Robert C. Hilliard declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney duly licensed to practice in the State of Texas and an attorney with the law firm of Hilliard Martinez Gonzales LLP, in Corpus Christi, Texas. I am one of the attorneys representing Plaintiff, Andre Royal, in this case, and I submit this Declaration in Support of Plaintiff's Response to the Board Defendants' Motion to Dismiss Plaintiff's Amended Complaint ("Hilliard Decl.").

2. Attached as "Exhibit 1" is a true and correct copy of the correspondence between Stephanie Anderson and the Board Defendants referencing Andre Royal's NFL file. ("Ex. 1, NFL File Corres.").

3. Attached as "Exhibit 2" is a true and correct copy of the March 2, 2000 and July 12, 2000 letter from the Board Defendants to Andre Royal, enclosed with the application for disability benefits. ("Ex. 2, Application Letters")

4. Attached as "Exhibit 3" is a true and correct copy of the New Orleans Saints' medical history for Andre Royal. ("Ex. 3, Saints Med.")

5. Attached as "Exhibit 4" is a true and correct copy of the New Orleans Saints' medical problems for Andre Royal. (Ex. 4, Saints Med. Prob.).

6. Attached as “Exhibit 5” is a true and correct copy of the Board Defendants’ reclassification of Andre Royal’s disability benefits from Inactive to Football Degenerative. (“Ex. 5, Reclassification”).

7. Attached as “Exhibit 6” is a true and correct copy of the Board Defendants’ Physician’s Report by Dr. Ronald Folmer. (“Ex. 6, Folmer Rpt.”).

8. Attached as “Exhibit 7” is a true and correct copy of Andre Royal’s initial award of Inactive disability benefits. (Ex. 7, Inactive Benef.”).

9. Attached as “Exhibit 8” is a true and correct copy of Stephanie Anderson’s October 10, 2000 letter to the Board Defendants requesting early consideration for Andre Royal’s disability and line of duty applications. (“Ex. 8, Oct. 10, 2000 Letter”).

10. Attached as “Exhibit 9” is a true and correct copy of Stephanie Anderson’s Authorized Representative Designation. (“Ex. 9, Anderson Design”).

11. Attached as “Exhibit 10” is a true and correct copy of the June 29, 2015 denial of reclassification. (“Ex. 10, Reclass Denial”).

12. Attached as “Exhibit 11” is a true and correct copy of the Indianapolis Colts October 9, 1999 suspension of Andre Royal. (“Ex. 11, Colts Suspension”).

13. Attached as “Exhibit 12” is a true and correct copy of the Board Defendants’ Final Decision on Review dated December 2, 2015. (“Ex. 12, Final Decision”).

14. Attached as “Exhibit 13” is a true and correct copy of the Andre Royal’s final appeal to the Board Defendants. (“Ex. 13, Final Appeal”).

15. Attached as “Exhibit 14” is a true and correct copy of the Andre Royal’s contract with the New Orleans Saints. (“Ex. 14, Saints Contract”).

16. Attached as “Exhibit 15” is a true and correct copy of the Andre Royal’s medical history from the Indianapolis Colts. (“Ex. 15, Colts Medical”).

17. Attached as “Exhibit 16” is a true and correct copy of the Andre Royal’s termination from the Indianapolis Colts. (“Ex. 16, Colts Termination”).

18. Attached as “Exhibit 17” is a true and correct copy of the Andre Royal’s retirement letter. (“Ex. 17, Retirement Letter”).

19. Attached as “Exhibit 18” is a true and correct copy of the Andre Royal’s application for disability benefits. (“Ex. 18, Benefits App.”).

20. Attached as “Exhibit 19” is a true and correct copy of the January 15, 1999 memorandum to Andre Royal regarding his statement of benefits. (“Ex. 19, Jan. 99’ Memo”).

Executed this 30th day of September 2019, in Corpus Christi, Texas.

  
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ROBERT C. HILLIARD